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May 16, 2018

Bruce Shaw, Esq.
2735 Terwood Road
Willow Grove, PA 19090

Re: Ross Morgan

Dear Mr. Shaw:

Please be advised that I represent Concours Classic Motor Cars involving the above-stated matter. I am aware that Concours rented a location to conduct its restoration, etc. business that consisted of 27, 900 square feet. That location was sold and Concours had to relocate, in a very short time period, to 1300 Research Forest, Macedon, NY 14502 in the latter part of 2017. That location is considerably smaller which required Concours to use an additional warehouse and tractor trailer storage facilities.

It is my understanding that parts for Concours clients, and Mr. Morgan, are stored, not only in the warehouse, but also in five (5) tractor trailers.

It is my further understanding that there are literally many thousands of parts that must be removed, itemized and matched up to the multiple projects Concours is working on. This process was delayed because of our typical "Rochester winters."

Additionally, I was advised that Concours had already forwarded a 54 foot shipping container consisting of thousands of parts to Mr. Ross Morgan.

It is going to take time to review and itemize the parts list that you forwarded to Concours on May 10, 2018. Further, Concours still wishes to continue a relationship with Mr. Ross Morgan; locating parts; purchasing parts; assembling parts; and manufacturing parts that are needed in the restoration process of collectible cars.

I have been advised that Concours will earnestly start the retrieval process in order to resolve this matter. I have also been advised that they will contact me in the near future for me to contact when you can start to retrieve parts. It is believed that the first shipping would be available in June 2018.

Please contact me at your convenience. Thank you.

Sincerely,



David R. Morabito